

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS, LLC, and STEVEN BARLOW,	)	
	)	
Plaintiffs/Counterclaim Defendants,	)	
	)	
v.	)	
	)	
I JIAN LIN and ENCOMPASS COMMUNICATIONS, INC.,	)	
	)	
Defendants/Counterclaim Plaintiffs	)	C.A. No. 1:16-cv-11914-LTS
	)	
v.	)	
	)	
VALENTIN DAVID GURVITZ, ESQ., BOSTON LAW GROUP, P.C., and SONYA LIVSHITS,	)	
	)	
Counterclaim Defendants	)	

**ASSENTED TO MOTION FOR EXTENSION OF TIME FOR  
DEFENDANTS TO ANSWER PLAINTIFF'S AMENDED COMPLAINT  
AND FILE AN AMENDED COUNTERCLAIM**

Defendants/Counterclaim Plaintiffs I Jian Lin and Encompass, with the assent of Plaintiffs/Counterclaim Defendants Fossa Ltd., Icelandic PLUS, LLC, and Steven Barlow, and Counterclaim Defendants Valentin David Gurvitz, Esq., Boston Law Group, P.C., and Sonya Livshits, respectfully request that this Honorable Court extend the deadline for Defendants to file an Answer to Plaintiffs' Amended Complaint and an Amended Counterclaim until and including January 19, 2018.

As grounds for this motion, Defendants/Counterclaim Plaintiffs state the following:

1. Plaintiffs filed their Amended Complaint on November 28, 2017.

2. Due to several unforeseen emergency matters as well combined with the approaching holiday season, counsel for Defendants/Counterclaim Plaintiffs require additional time to file an Answer to the Amended Complaint and Amended Counterclaim.

3. All other parties in this matter have assented to this motion.

4. Allowing Defendant's motion will not result in prejudice to any party to this case, will not cause undue delay, and is in the interest of judicial economy.

Respectfully submitted,

Dated: December 14, 2017

/s/Daniel J. Murphy  
Daniel J. Murphy (BBO No. 549073)  
Daniel Murphy (BBO No. 685760)  
THE MURPHY LAW GROUP, LLC  
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*Counsel for I Jian Lin and  
Encompass Communications, Inc.*

ASSENTED TO:

/s/ Thomas M. Ciampa  
Thomas M. Ciampa  
*Counsel for Steven Barlow, Fossa, Ltd.,  
IcelandicPLUS, LLC and Sonya Livshits*

ASSENTED TO:

/s/ Evan Fray-Witzer  
Evan Fray-Witzer  
*Counsel for Valentin Gurvits,  
Boston Law Group, P.C.*

Certificate of Service

I, Daniel J. Murphy, hereby certify that on December 14, 2017, I served the foregoing Notice of Appearance and Request for Notice by causing a true and correct copy of the same to be sent electronically to the registered participants identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Daniel J. Murphy

Daniel J. Murphy